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Attorneys for Plaintiff/Counter-Defendant  
GOOGLE INC.

**UNITED STATES EASTERN DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

GOOGLE INC., a Delaware corporation,

Plaintiff/Counter-Defendant,

v.

RICHARD WOLFE d/b/a FROOGLES.COM,  
an individual,

Defendant/Counterclaimant.

CV-05-1779 (TCP) (ETB)

**PLAINTIFF GOOGLE INC.'S IDENTIFICATION OF PROPOSED  
PARTICIPANTS IN SETTLEMENT CONFERENCE**

During the December 8, 2006 telephone conference, Judge Boyle ordered that plaintiff Google Inc.'s counsel submit information concerning Google's executives, and proposed non-lawyer business representatives of Google at any settlement conference. Google proposes that Bindu Reddy, the Product Manager for Froogle, or Craig Nevill-Manning, Engineering Director for Froogle, are the most appropriate Google business representatives to attend any settlement conference. They have been directly involved in the development and use of Froogle.com and

they are the two individuals at Google that are the most familiar with Google's plans and strategies concerning Froogle.com. Either will be granted full authority to resolve this matter. Google has proposed both of these executives to defendant as possible representatives at the hearing. Defendant's counsel has not approved Mr. Nevill-Manning, but has not yet responded to the suggestion of Ms. Reddy.

During the settlement conference, the Court requested a "masthead" of Google's executives. Google's Executive Management is listed online at [www.google.com/corporate/execs.html](http://www.google.com/corporate/execs.html). Google has many other layers of management, but they do not exist on any publicly available organization charts. The Executive Management team manages Google at a high level and would not be appropriate representatives at a settlement conference because they are not directly involved with the Froogle service and are not as familiar with the facts or issues associated with the lawsuit. Most of them are based in Mountain View, California and others are located in other countries around the world. Requiring them to come to the conference would be a waste of time and money for all those involved. Pursuant to the Court's instruction, Google and its counsel will continue to work with defendant's counsel concerning an appropriate representative.

Dated: December 8, 2006  
Seattle, Washington.

Respectfully submitted,

Perkins Coie LLP  
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By: \_\_\_\_\_

Ramsey M. Al-Salam  
Admitted Pro Hac Vice  
Attorneys for Plaintiff Google Inc.

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2006, a true and correct copy of the foregoing was duly served on counsel for defendant via CM/ECF filing as follows:

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